

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

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In Re: Brian Goodman, Sr.

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Case No.: 25-10233-*KB
Chapter 13

Debtor

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US Bank Trust, NA

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Movant

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Hearing Date: 9/24/2025
Hearing Time: 10:00 A.M.

v.

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Brian Goodman, Sr.

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Respondent

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DEBTOR'S ANSWER AND OBJECTION

TO

MOVANT'S MOTION FOR RELIEF FROM AUTOMATIC STAY

NOW COMES the Debtor and Respondent in the above-captioned matter, Brian Goodman, Sr., by and through his Attorneys, Raymond J. DiLucci, P.A. and Answers and Objects to Movant's Motion for Relief from Automatic Stay and in support thereof says:

1. That the Respondent admits the allegations contained in paragraph 1.
2. That the Respondent admits the allegations contained in paragraph 2.
3. That the Respondent admits the allegations contained in paragraph 3.
4. That the Respondent admits the allegations contained in paragraph 4.
5. That the Respondent admits the allegations contained in paragraph 5.
6. That the Respondent admits the allegations contained in paragraph 6.
7. That the Respondent admits the allegations contained in paragraph 7.
8. That the Respondent admits the allegations contained in paragraph 8.
9. That the Respondent lacks sufficient knowledge to admit or deny the allegations contained in paragraph 9 as the Proof of Claim that was filed by the Movant has a different total amount.

10. That the Respondent admits the allegations contained in paragraph 10.
11. That the Respondent admits the allegations contained in paragraph 11 regarding the Liens of the movant and Concord Hospital, however states that the alleged lien of Mark N. Plantier is the subject of an Objection to the Proof of Claim as it has been judicially voided.
12. That the Respondent admits the allegations contained in paragraph 12 match the amount stated on the Proof of Claim.
13. That the Respondent admits the allegations contained in paragraph 13.
14. That the Respondent admits the allegations contained in paragraph 14.
15. That the Respondent neither admits nor denies the allegations contained in paragraph 15.
16. That the Respondent admits the allegations contained in paragraph 16.
17. That the Respondent denies the allegations contained in paragraph 17.
18. That the Respondent denies the allegations contained in paragraph 18.
19. That the Respondent denies the allegations contained in paragraph 19 and states that this is a rental property and the income derived from the rental of the property is necessary for a successful reorganization.
20. That the Respondent denies the allegations contained in paragraph 20.

WHEREFORE, the Respondent respectfully request that this Honorable Court:

- A. Deny Movant's Motion for Relief from Automatic Stay; and
- B. For such other and further relief as is deemed fair, just and equitable.

Respectfully submitted,
Brian Goodman, Sr.
By and through his Attorney,

Dated: September 17, 2025

/s/ Kathleen E. McKenzie, Esq.
Kathleen E. McKenzie, Esquire
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